

Exhibit D to
Stipulation of Settlement
(Summary Publication Notice)

LEGAL NOTICE

A federal court authorized this Notice. It is not a solicitation from a lawyer.

If you used AshleyMadison.com on or before July 20, 2015, you may be eligible to receive benefits from a class action settlement.

A proposed Settlement has been reached in a class action lawsuit involving the Ruby Corp. (previously named Avid Life Media Inc.) and Ruby Life Inc. (previously named Avid Dating Life Inc.) (together, "Avid") owned website AshleyMadison.com, and Noel Biderman, Avid's former Chief Executive Officer (altogether, "Defendants"). You may be entitled to a payment of up to \$3,500. The Settlement resolves litigation over a data security breach by an unauthorized person or persons who publicly released personal information of AshleyMadison.com customers. The Parties have agreed to settle the Action in its entirety, without any admission of liability by Defendants. The case is known as In Re Ashley Madison Customer Data Security Breach Litigation, Case No. 4:15-MD-02669-JAR (N.D. Mo.).

Who's included in the Settlement Class? The proposed Settlement Class includes all United States residents who used Ashley Madison on or before July 20, 2015.

What benefits does the Settlement provide? The Settlement provides for a Settlement Fund in the amount of \$11,200,000, to pay the Claims of Eligible Claimants, the costs to administer and give notice of the Settlement, and any attorneys' fees and expenses and Class Representative Service Awards approved by the Court.

Eligible Claimants are the Settlement Class Members who used Ashley Madison on or before July 20, 2015 including, but not limited to, all persons whose Personal Information was compromised or released publicly as a result of the Data Breach, who purchased the Paid Delete or Full Delete option on AshleyMadison.com, who sustained losses as a result of the Data Breach, or who purchased credits and have a good faith belief that they used those credits to communicate with "engagers" or "bots" on Ashley Madison. Each Eligible Claimant who submits a valid and timely Claim may receive a payment not to exceed \$3,500. If the remaining amount is insufficient to pay all Eligible Claimants in full, payments will be reduced on a *pro rata* basis.

How do I receive Settlement benefits? In order to receive monetary benefits under this Settlement, Settlement Class Members must complete and submit a Claim Form to the Settlement Administrator. The deadline for submitting a Claim Forms is [date] if submitted online via the Settlement Website www.WebsiteDataBreach.com or your Claim Form must be postmarked by [date] if submitted by U.S mail to the Settlement Administrator at: Website Data Breach, 1801 Market Street,

Suite 660, Philadelphia, PA 19103. Claim Forms can also be downloaded from www.WebsiteDataBreach.com, by calling toll-free [phone number], emailing the Settlement Administrator at WebsiteDataBreach@AdministratorClassAction.com, or by mailing a request to the Settlement Administrator at the address below.

Who represents me? The Court appointed the law firms of Dowd & Dowd, P.C., The Driscoll Firm, P.C., and Heninger Garrison Davis, LLC as Class Counsel to represent the Settlement Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

Your options. If you are included in the Settlement Class and do not submit a Claim Form, your rights will be affected and you will not receive any benefits from this Settlement. If you do not want to be legally bound by the Settlement, you must exclude yourself from the Settlement by [date for opting out] or you won't be able to sue, or continue to sue, Defendants about the legal claims in this case. If you do not exclude yourself, you may object to the Settlement by submitting a written objection by [date for objections]. Instructions on how to exclude yourself or object to the settlement are in the Long Form Notice available at www.WebsiteDataBreach.com.

The Settlement Agreement, Long Form Notice, and other documents relevant to this case are available at the settlement website, www.WebsiteDataBreach.com.

The Final Approval Hearing. The Court will hold a hearing on [month/day/year] at [time a.m./p.m] to consider whether to approve the Settlement, award Class Counsel Attorneys' Fees and Expenses up to one third of the Settlement, and award the Class Representatives up to \$5,000 each for their service. If approved, these amounts will be deducted from the Settlement Fund. Please check www.WebsiteDataBreach.com for updates as the Court may continue the date of the hearing.

Want More Information? Call toll-free [phone number], visit www.WebsiteDataBreach.com or write to **Settlement Administrator** at Website Data Breach, 1801 Market Street, Suite 660, Philadelphia, PA 19103. PLEASE DO NOT CONTACT THE COURT.

Call Toll-Free [phone number]
www.WebsiteDataBreach.com